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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

People of the State of California, et al.
v.

v.
Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC

MDL No. 3047

Case No. 4:22-md-03047-YGR
4:23-cv-05448-YGR

STIPULATION ON CONFIDENTIALITY FOR EXPERTS

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

The MDL State AG Plaintiffs and Meta, YouTube, Snap, and TikTok (collectively, the “Parties”) stipulate and agree as follows:¹

A. JCCP expert transcripts will be shared by YouTube, Snap, and TikTok with the State AG Plaintiffs who have designated those same experts — or in whose cases Meta has designated those same experts — with appropriate redactions for YouTube, Snap, and TikTok confidential information.

B. Questioning attorneys will attempt to sequence the expert depositions to ask questions at

¹ It is noted that in the interest of efficiency Defendants have also reached agreement on these terms with other State AG Plaintiffs Massachusetts, Tennessee and Arkansas, who are not subject to federal jurisdiction.

1 the end of the deposition session that rely upon or may elicit confidential information of
2 YouTube, Snap, and TikTok. In this way, State AG Plaintiffs may attend the earlier parts of the
3 deposition that cover general background, general industry issues, and Meta-specific issues, and
4 State AG Plaintiffs will be excused from the later YouTube, Snap, and TikTok specific portions
5 of the deposition. Questions that rely upon or elicit a mix of confidential and non-confidential
6 YouTube, Snap, and TikTok information will be asked in the later portion of the deposition not
7 attended by State AG Plaintiffs. No State AG Plaintiff may ask questions of an expert to elicit
8 opinions about YouTube, Snap, or TikTok, unless (i) those questions relate also to issues that
9 implicate Meta, such as discussion of the social media industry generally or comparisons of Meta
10 to YouTube, Snap, or TikTok and (ii) do not elicit any confidential information of YouTube,
11 Snap, or TikTok.

12 C. The State AG Plaintiffs will receive only copies of expert reports that have YouTube,
13 Snap, and TikTok confidential information redacted, including as exhibits at depositions. The
14 copies provided will be in a machine-readable format so that they are searchable.

15 D. Disclosure of YouTube, Snap, and TikTok confidential information should take place only
16 in the later portion of each deposition, as described in paragraph B above, so that real time and
17 rough draft versions of transcripts can be provided to State AG Plaintiffs as expeditiously as
18 possible for the portions of the depositions that the State AG Plaintiffs attend. However, if an
19 expert's answer to a question in the earlier portions of the deposition attended by State AG
20 Plaintiffs would reveal confidential information of YouTube, Snap, or TikTok, then the expert
21 should disclose that before answering, and the answer should be deferred to later in the deposition
22 unless that is impracticable, in which case the State AG Plaintiffs will be excluded from the
23 deposition at that point while any confidential information of YouTube, Snap, or TikTok is
24 disclosed. If the State AG Plaintiffs are asked to leave the deposition session because of
25 confidentiality issues of YouTube, Snap, or TikTok, that portion of the deposition will be
26 segregated for confidentiality review as provided in sections E and F, and the remaining
27 section(s) of the transcript not implicating confidential information of YouTube, Snap, and
28 TikTok may be provided to the State AG Plaintiffs as soon as possible in real time, rough draft,

1 and final.

2 E. YouTube, Snap, and TikTok will verify and/or update confidentiality designations within
3 20 days after receiving the final transcript, including producing portions to State AG Plaintiffs
4 that were overly designated as confidential information (if any) during the portions of the
5 deposition session not attended by State AG Plaintiffs as described in sections B and D above.
6 The State AG Plaintiffs will provide an email address where YouTube, Snap, and TikTok are to
7 send the final redacted transcripts.

8 F. Within 7 days after the later of (i) July 30, 2025, or (ii) receipt of a relevant final
9 deposition transcript in the JCCP cases, YouTube, Snap, and TikTok will produce to State AG
10 Plaintiffs machine-readable electronic files of the transcripts for expert depositions taken in the
11 JCCP case, including exhibits that do not contain YouTube, TikTok, or Snap confidential
12 information, where those same experts have been designated by the State AG Plaintiffs or Meta in
13 cases brought by the State AG Plaintiffs. Except, in no event shall transcripts in the JCCP matter
14 be provided to State AG Plaintiffs any later than 7 days before the date scheduled for the
15 deposition of the same witness in the MDL. Those transcripts and exhibits shall be redacted to
16 exclude confidential information of YouTube, Snap, or TikTok. The MDL State AG Plaintiffs
17 identify experts Auerbach, Gotlib, Honaker, Platt, Shear, Berman, Baiocchi, and Twenge as the
18 experts in the JCCP matter covered by this paragraph and will supplement this list as soon as
19 possible should additional experts be added. Relevant final expert deposition transcripts in the
20 MDL will be provided consistent with section E above, except as to the time frames stated in this
21 paragraph.

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1 Dated: July 28, 2025

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